

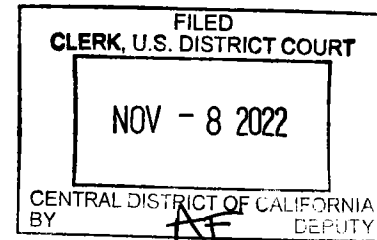
1 **SUSAN SCHOFIELD**

2 25001 Magic Mountain Pkwy. #620

3 Valencia, CA. 91355

4 (661) 857-2120

5 **PLAINTIFF IN PRO PER**



7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

10
11 SUSAN SCHOFIELD, an individual,
12 Plaintiff,

13
14 v.

15 COUNTY OF LOS ANGELES, et al.
16 Defendants.
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Case No: 2:22-cv-04332-JGB (AS)

**PLAINTIFF'S NOTICE OF
MOTION TO RECONSIDER THE
GRANTING OF** Defendant
Menke's Motion (Dkt. No. 39) and
dismissing Plaintiff's Complaint
with prejudice with respect to
Defendant Menke

HEARING DATE:

HEARING TIME:

JUDGE: Hon. Alka Sagar

PLACE: Courtroom 540

1 **TO THE HONORABLE COURT**

2
3 **PLEASE TAKE NOTICE** that on _____, at _____,
4 or as soon thereafter as this matter may be heard in the above-entitled
5 Court located at Roybal Federal Building and United States Courthouse,
6 255 E. Temple St., Los Angeles, CA, 90012, Susan Schofield, the Plaintiff in
7 this case will move this court to reconsider the granting of Defendant
8 Menke's Motion (Dkt. No. 39) and dismissing Plaintiff's Complaint with
9 prejudice with respect to Defendant Menke. (Docket Nos. 46-47).

10
11 This motion is based on the following documents: (1) Notice of
12 Errata; (2) Memorandum of Points and Authorities; (3) Declaration; (4)
13 Proposed Order; and (5) the complete files and records in this action.

14
15 This motion is not made following the conference of counsel
16 pursuant to L.R.7-3 because Plaintiff is proceeding pro se, the parties do
17 not need to comply with the following Local Rules: Rules 7-3, 7-14, and 7-15
18 (regarding motions and pre-filing conference).

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21 **SUSAN SCHOFIELD**

22 PRO SE LITIGANT

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25 **DATED:** NOVEMBER 7, 2022

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SUSAN SCHOFIELD

PRO SE LITIGANT

1 **SUSAN SCHOFIELD**

2 25001 Magic Mountain Pkwy. #620

3 Valencia, CA. 91355

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5 **PLAINTIFF IN PRO PER**

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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
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11 SUSAN SCHOFIELD, an individual,

12 Plaintiff,

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14 v.

15 COUNTY OF LOS ANGELES, et al.

16 Defendants.
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Case No: 2:22-cv-04332-JGB (AS)

**MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
MOTION TO RECONSIDER AND
OBJECTION TO ORDER**

GRANTING OF Defendant
Menke's Motion (Dkt. No. 39) and
dismissing Plaintiff's Complaint
with prejudice with respect to
Defendant Menke

HEARING DATE:

HEARING TIME:

JUDGE: Hon. Alka Sagar

PLACE: Courtroom 540

1 » **INTRODUCTION**

2 1. Before the court is Susan Schofield ("Plaintiff") and Plaintiff's
3 Objection to the Court's Order to GRANT Defendant Menke's Motion
4 (Docket No. 39) and dismissing Plaintiff's Complaint with prejudice with
5 respect to Defendant Menke. (Docket Nos. 46-47). On September 14, 2022,
6 the Court granted Defendant Menke's Motion to Dismiss on the basis of:
7 (1) Plaintiff's federal constitutional claim against Defendant Menke is time-
8 barred; and (2) Plaintiff's potential state-law legal malpractice claim against
9 Defendant Menke is time-barred.

10 2. The attached Notice of Errata includes Plaintiff's statement
11 showing that she did not know that new factual allegations could be
12 included in an Opposition to a Motion to Dismiss and believed that the
13 necessary allegations that would prevent a dismissal on the basis of a time
14 bar could have been cured through an amended Complaint. For purposes
15 of curing the time bar, Plaintiff also attaches her Exhibit A as to allegations
16 directed to Defendant Menke.

17 3. Plaintiff respectfully asks the court to accept her apology for
18 misunderstanding the process of an Opposition to a Motion to Dismiss as
19 a *pro se* litigant with limited knowledge of practice in procedures as further
20 described in the attached Notice of Errata; and further asks this Court to
21 reconsider the Granting of Defendant Menke's Motion to Dismiss.

22
23 » **BACKGROUND**

24 4. On June 23, 2022, Plaintiff, proceeding pro se, filed a Civil Rights
25 Complaint pursuant to 42 U.S.C. § 1983 ("Complaint") against the following
26 individuals: (1) the County of Los Angeles; (2) Judy Thomas; (3) Karen La; (4)
27 Sandra Chavez; (5) Wendy Contreras; (6) Juliet Macias; (7) Linda Flores; (8)
28 Arnesha Allen; (9) Bernadette Henley; (10) Laura Menke; and (11) Veronica

1 Betancourt-Parez. (Docket No. 1).

2 5. On August 5, 2022, Defendant Menke filed a Motion to Dismiss the
3 Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for lack of
4 jurisdiction, for untimeliness, and because Plaintiff has failed to state a
5 claim upon which relief can be granted. ("Motion," Docket No. 39).

6 6. On August 16, 2022, Plaintiff filed an Opposition to the Motion.
7 ("Opposition," Docket No. 43).

8 7. Defendant Menke filed a Reply on August 25, 2022. ("Reply," Docket
9 No. 45).

10 8. On September 14, 2022, the Court granted Defendant Menke's
11 Motion to Dismiss, recommending that the District Court issue an Order:
12 (1) approving and accepting this Report and Recommendation; (2)
13 GRANTING Defendant Menke's Request for Judicial Notice (Docket No. 39-
14 3); and (3) GRANTING Defendant Menke's Motion (Docket No. 39) and
15 dismissing Plaintiff's Complaint with prejudice with respect to Defendant
16 Menke. ("Recommendations" Docket. No. 47)

17 9. Plaintiff seeks a Motion to reconsider the third point of the
18 Recommendations, "GRANTING Defendant Menke's Motion (Docket No.
19 39) and dismissing Plaintiff's Complaint with prejudice with respect to
20 Defendant Menke."

21 22 » LEGAL STANDARD

23 10. A court may reconsider its own order. See C.D. Cal. L.R. 7-18.
24 Reconsideration of a court's order is an extraordinary remedy and should
25 be used sparingly. *Kona Enters., Inc v. Estate of Bishop*, 229 F.3d 877, 890
26 (9th Cir. 2000).

27 11. "In this district, motions for reconsideration are governed by Local
28 Rule 7-18, which states: '[a] motion for reconsideration of the decision on

any motion may be made only on the grounds of (1) a material difference in fact or law from that presented to the Court before such decision that in the exercise of reasonable diligence could not have been known to the party moving for reconsideration at the time of such decision, or (b) the emergence of new material facts or a change of law occurring after the time of such decision, or (c) a manifest showing a failure to consider material facts presented to the Court before such decision.” *Milton H. Greene Archives, Inc. v. CMG Worldwide, Inc.*, 568 F.Supp.2d 1152, 1162 (C.D. Cal. 2008) (quoting C.D. Cal. L.R. 7-18); see Fed.R.Civ.P. 54(b).

12. Furthermore, “[n]o motion for reconsideration shall in any manner repeat any oral or written argument made in support of or in opposition to the original motion,” C.D. Cal. L.R. 7-18, and “a motion for reconsideration may not be made on the grounds that a party disagrees with the Court’s application of legal precedent,” *Pegasus Satellite Television, Inc. v. DirecTV, Inc.*, 318 F.Supp.2d 968, 981 (C.D. Cal. 2004). Finally, “[w]hether to grant a motion for reconsideration under Local Rule 7-18 is a matter within the court’s discretion.” *Milton H. Greene*, 568 F.Supp.2d at 1162.

» ARGUMENT

13. Plaintiff respectfully attaches **Notice of Errata** and **Exhibit A** to include new information of material fact, “that presented to the Court before such decision that in the exercise of reasonable diligence could not have been known to the party moving for reconsideration at the time of such decision.” *Milton H. Greene*, 568 F.Supp.2d at 1162.

14. In this case, Plaintiff did not know that she could allege new allegations in the Opposition and believed the elements could be cured through an amended Complaint. (See further, Notice of Errata at ¶ 3-9).

A Plaintiff's Complaint is Not Untimely

15. Plaintiff argues that her Complaint is not untimely as to Defendant Menke in consideration of the new information of material fact included in Exhibit A to this motion.

16. Defendant Menke argues, among other things, that the Complaint is untimely. (Motion at 8-9). On September 14, 2022, the Court granted Defendant Menke's Motion to Dismiss on the basis of: (1) Plaintiff's federal constitutional claim against Defendant Menke is time-barred; and (2) Plaintiff's potential state-law legal malpractice claim against Defendant Menke is time-barred. (Recommendation at 6:8-11:16).

17. A claim accrues when the plaintiff knows or has reason to know of the injury which is the basis of this action. *Kimes v. Stone*, 84 F. 3d 1121, 1128 (9th Cir. 1996); see also *Knox v. Davis*, 260 F.3d 1009, 1013 (9th Cir. 2001) (quoting *TwoRivers v. Lewis*, 174 F.3d 987, 992 (9th Cir. 1999)).

18. As noted by this Court, "Plaintiff's claim against Defendant Menke arises from Defendant Menke's representation of Plaintiff before and the initial adjudication hearing. Defendant Menke's representation of Plaintiff began on March 13, 2019 (Defendant Menke's Request for Judicial Notice Exh. A) and, as Plaintiff concedes, Defendant Menke's representation of Plaintiff ended when the initial adjudication decision was rendered on August 5, 2019. (Defendant Menke's Request for Judicial Notice Exhs. D-E; Opposition at 6). By August 27, 2019, Plaintiff was represented by new counsel. (Defendant Menke's Request for Judicial Notice Exh. F)." (Recommendations at 7:1-10).

19. However, Plaintiff did not know, or did not have reason to know, of Defendant Menke's actionable conduct until December 2021 after Defendant Menke stopped representing Plaintiff and new counsel appeared on Plaintiff's behalf when Plaintiff was able to review the records

1 (May 2021), began to ask questions after the review of records (July 2021)
2 and knew (December 2021) that Defendant Menke had violated Plaintiff's
3 rights. See Exhibit A at ¶ 4-14.

4 20. In addition, due to the COVID-19 pandemic, the Judicial Council of
5 California promulgated Emergency Rule 9, which "broadly" tolled any
6 statutes of limitations for a civil cause of action that exceeds 180 days,
7 from April 6, 2020 to October 1, 2020. See *Palacios v. Interstate Hotels &*
8 *Resorts Inc.*, No. 21-cv05799-TSH, 2021 U.S. Dist. LEXIS 169334, at *6-7 (N.D.
9 Cal. Sep. 7, 2021) (citing Judicial Council of Cal. Emergency Rule 9 &
10 Advisory Committee Comment).

11 21. Moreover, Plaintiff suffers from bipolar disorder II and lacked the
12 legal capacity to make decisions until she began working with Marissa
13 Hernandez, Plaintiff's parent advocate, to help calm Plaintiff to rationally
14 process the damages that she's suffered as a result of Defendants' actions.
15 See Complaint at paragraphs 70-71 and Exhibit A at paragraph 13.

16
17 **B This Case Should Proceed with Defendant Menke on the Merits**

18 22. Plaintiff argues this case should proceed with Defendant Menke on
19 the merits with leave to amend and not be dismissed on the basis of
20 procedural grounds where Plaintiff is a pro se litigant and lacking
21 experience in the practice of law.

22 23. Many motions to dismiss or to strike can be avoided if the parties
23 confer in good faith (as required by Local Rule 7-3), especially for perceived
24 defects in a complaint, answer, or counterclaim that could be corrected by
25 amendment. See *Chang v. Chen*, 80 F.3d 1293, 1296 (9th Cir. 1996) (where a
26 motion to dismiss is granted, a district court should provide leave to amend
27 unless it is clear that the complaint could not be saved by any amendment).

28 24. As noted in Defendant Menke's Motion to Dismiss, defense

1 counsel reached out to Plaintiff via telephone to discuss the defects in her
2 Complaint against Menke. The communications with Schofield continued
3 over the course of the few days, but the parties did not reach agreement
4 that would remove the need for the instant motion. (Motion to Dismiss 5:4-
5 5:8). However, at this time, defense counsel denied Plaintiff's attempt to
6 review further allegations that would cure the defects as shown through
7 Exhibit A to this motion.

8 25. Plaintiff argues that this Court should provide leave to amend as it
9 is not clear that the Complaint could not be saved by any amendment.

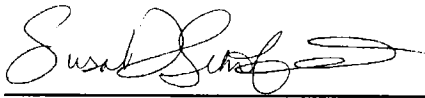
10
11 **» CONCLUSION**

12 26. For these reasons, Plaintiff respectfully asks this Court to
13 reconsider the orders made on Docket Nos. 46-47 and to Grant in part
14 Defendant Menke's Motion to Dismiss with leave for Plaintiff to amend the
15 Complaint.

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17
18 **SUSAN SCHOFIELD**

19 PRO SE LITIGANT

20
21 **DATED:** NOVEMBER 7, 2022

22 

23 **SUSAN SCHOFIELD**

24 PRO SE LITIGANT

SUSAN SCHOFIELD

25001 Magic Mountain Pkwy. #620

Valencia, CA. 91355

(661) 857-2120

PLAINTIFF IN PRO PER

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SUSAN SCHOFIELD, an individual,

Plaintiff,

v.

COUNTY OF LOS ANGELES, et al.

Defendants.

Case No: 2:22-cv-04332-JGB (AS)

NOTICE OF ERRATA

HEARING DATE:

HEARING TIME:

JUDGE: Hon. Alka Sagar

PLACE: Courtroom 540

» INTRODUCTION

1. I, Susan Schofield ("Plaintiff"), file this NOTICE OF ERRATA to include the reason why I did not include new allegations that were not asserted in the original complaint in the Opposition to Defendant Menke's Motion to Dismiss.

» BACKGROUND

2. On September 14, 2022, this Court granted Defendant Menke's

1 Motion to Dismiss, recommending that the District Court issue an Order:
2 (1) approving and accepting this Report and Recommendation; (2)
3 GRANTING Defendant Menke's Request for Judicial Notice (Docket No. 39-
4 3); and (3) GRANTING Defendant Menke's Motion (Docket No. 39) and
5 dismissing Plaintiff's Complaint with prejudice with respect to Defendant
6 Menke. ("Recommendations" Docket. No. 47).

7
8 **» NOTICE OF ERRATA**

9 3. On the Recommendations the Court noted that I did not identify
10 Defendant Menke's title or role in the wrongful action, only that Defendant
11 Menke is believed by Plaintiff to be a resident of the County of Los Angeles;
12 that Defendant Menke "knowingly, intentionally, and voluntarily
13 collaborated with the remaining defendants in effectuating their unlawful
14 scheme/plan to keep plaintiff's children from [my] care, custody, and
15 control for as long as possible" (Complaint at 33); and that Defendant
16 Menke's actions were "undertaken in direct breach of her fiduciary duties
17 to her client, plaintiff" (Complaint at 33). (Recommendations 2:19-3:2).

18 4. Before this Court issued its Recommendation in Docket Nos. 46-47,
19 I thought that I would have the opportunity in an amended Complaint to
20 include factual allegations as it directly related to Defendant Menke.

21 5. Based on information and belief, I didn't know that I could include
22 new factual allegations that were not already alleged in the Complaint
23 through an Opposition to a Motion to Dismiss.

24 6. For these reasons, I didn't know it would be possible to argue
25 against the time-bar challenge without a leave to amend with new factual
26 allegations, as I am doing so through the attached Exhibit A.

27 7. To supplement my belief of the inability to include new factual
28 allegations, I argued a request for leave to amend. See Opposition at 8:8-

9:3.

8. Moreover, I didn't know there would be a difference between a *paid* pro se litigant in comparison to a pro se litigant proceeding in forma pauperis. Whereas a forma pauperis pro se litigant would have been granted leave to amend if at all possible to cure the defects.

9. Had I have known otherwise, then I would have attached an Exhibit A, as I am doing so in this Motion to Reconsider to show that it is possible to cure the defects.

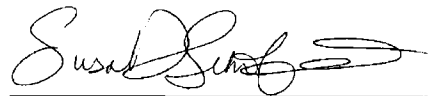
» **CONCLUSION**

10. For these reasons, I ask this Court to Grant my Motion to Reconsider supported by my Memorandum of Points and Authorities.

SUSAN SCHOFIELD

PRO SE LITIGANT

DATED: NOVEMBER 7, 2022



SUSAN SCHOFIELD

PRO SE LITIGANT

SUSAN SCHOFIELD

25001 Magic Mountain Pkwy. #620

Valencia, CA. 91355

(661) 857-2120

PLAINTIFF IN PRO PER

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SUSAN SCHOFIELD, an individual,

Plaintiff,

v.

COUNTY OF LOS ANGELES, et al.

Defendants.

Case No: 2:22-cv-04332-JGB (AS)

EXHIBIT A

HEARING DATE:

HEARING TIME:

JUDGE: Hon. Alka Sagar

PLACE: Courtroom 540

EXHIBIT A

1 **» FACTUAL ALLEGATIONS**

2 1. Defendant Laura Menke (“Defendant Menke”) acted as the Court-
3 appointed attorney for Susan Schofield (“Plaintiff”) in an underlying Los
4 Angeles County Juvenile Dependency Court case wherein Plaintiff’s two
5 minor children were removed from her custody.

6 2. On March 6, 2019, DCFS initiated the Underlying Action by filing a
7 protective custody warrant seeking authorization to remove Plaintiff’s
8 children from her custody. (Complaint at ¶24.)

9 3. That same day, the Los Angeles County Juvenile Dependency Court
10 found that it had jurisdiction over the children and issued a warrant that
11 authorized DCFS to remove the children from Plaintiff’s custody. (*Id.* at
12 ¶45.) Thereafter, DCFS removed the children from Plaintiff’s custody. (*Id.*
13 at ¶57.)

14 4. In March 2019, Defendant Menke was appointed to act as legal
15 counsel for Plaintiff in the Underlying Action at the Detention Hearing.

16 5. At this first hearing, Defendant Menke waived Plaintiff’s rights
17 without notice, information, or consent.

18 6. This was also the case in many other cases including the case of
19 Marissa Hernandez (“Marissa”) (Case No. 2:21-cv-07858-PA (JC)). The *first*
20 attorney representing Marissa, Marcellus Glasper (“Glasper”) also waived
21 her rights at the Detention Hearing without notice, information, or
22 consent. (See Marissa’s Fourth Amended Complaint at ¶114, filed in this
23 Court on November 11, 2022).

24 7. On August 9, 2019, Plaintiff asked Defendant Menke for all of the
25 evidence against her. On that same date, Defendant Menke responded by
26 indicating that she would not provide the requested evidence filed in the
27 juvenile court.

28 8. Likewise, Glasper also never provided Marissa with the social

1 workers' records that were filed in support of the protective custody
2 warrant and Marissa's Detention Hearings. Moreover, the attorney never
3 informed Marissa of her rights and instead told her she had no
4 constitutional rights in the juvenile court. (See Marissa's Fourth Amended
5 Complaint at ¶114, filed in this Court on November 11, 2022).

6 9. The adjudication hearing decision (on or around August 2, 2019)
7 marked the end of Defendant Menke's representation of Plaintiff who was
8 thereafter represented by a different attorney.

9 10. On or around May 2021, Plaintiff received all the records from the
10 juvenile court proceedings during the time that Defendant Menke was the
11 court appointed attorney for Plaintiff. These records including the
12 transcripts and all of the filings submitted to the juvenile court by DCFS
13 which included thousands of documents.

14 11. On or around July 29, 2021, Plaintiff began to question how it was
15 possible for her children to continue to be removed after reviewing the
16 entire record. Plaintiff asked one of the following attorneys (Maia Spotts)
17 if Defendant Menke submitted relevant evidence to the juvenile court. (See
18 Exhibit B). At this time, Maia did not respond with any information that
19 could clarify the meaning of the continued removal as a result of what was
20 done by Defendant Menke.

21 12. On or around December 2021, Plaintiff began to ask her current
22 court appointed attorney, Farhan, about the same questions that were
23 directed to Maia Spotts. On or around December 9, 2021, Farhan indicated
24 that it was the errors and omissions by Defendant Menke that resulted in
25 his inability to overcome the damage that was done, in that, he was unable
26 to argue the perjured testimony by Defendant Thomas which resulted in
27 the initial and continued removal over J.S. and B.S. (See Exhibit C).

28 13. It was at that point when (1) Farahan had informed Plaintiff of this


1 new information (Dec 2021) *and* (2) consistent behavior by other court
2 appointed attorneys assigned to other parents (Nov 2021, see Comp. 70-73)
3 that Plaintiff knew that Defendant Menke knowingly, intentionally, and
4 voluntarily collaborated with the remaining defendants in effectuating
5 their unlawful scheme/plan to keep Plaintiff's children from her care,
6 custody, and control for as long as possible and that Defendant Menke's
7 actions were undertaken in direct breach of her fiduciary duties to her
8 client, Plaintiff.

9 14. "B.S. *continues* to suffer severe mental and physical health
10 deterioration while under the care, custody, and control of DCFS without
11 a reasonable basis to continue the removal" (Complaint at ¶58, emphasis
12 added.) as a result.

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20 DATED: NOVEMBER 7, 2022

SUSAN SCHOFIELD

PRO SE LITIGANT



SUSAN SCHOFIELD

PRO SE LITIGANT

1 **SUSAN SCHOFIELD**

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5 **PLAINTIFF IN PRO PER**

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7 **UNITED STATES DISTRICT COURT**
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10
11 SUSAN SCHOFIELD, an
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17 Defendants.
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Case No: 2:22-cv-04332-JGB (AS)

EXHIBIT B

Re: Plaintiff's Motion to Reconsider

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20 **EXHIBIT B**
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11/7/22, 9:05 PM

Gmail - Indicated Versus FACT



Susan Schofield <susandschofield@gmail.com>

Indicated Versus FACT

Susan Schofield <susandschofield@gmail.com>

Thu, Jul 29, 2021 at 2:10 PM

To: "Spotts, Maia" <spottsm@ladlinc.org>, Cory Cabana <copa120663@gmail.com>, Hadassah Foster <Hadassah@handhassociatesusa.com>

Cc: "Lakisha L. Ri'chard" <Lakisha.Ri'chard@harborrc.org>

Bcc: Melinda Rockwell-Burnside <scorpio.red@gmail.com>, Dena Gittisarn <denacds@gmail.com>, Joyce Thomas <jothomas111@yahoo.com>

If RELEVANT Evidence had been submitted (not by you), but by Laura Menke and Dennis Smeal... and/or submitted by Jane Winer my Appellate Attorney Bodhi would never have had to go through any of this in the first place.

Susan

[Quoted text hidden]

1 **SUSAN SCHOFIELD**

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3 Valencia, CA. 91355

4 (661) 857-2120

5 **PLAINTIFF IN PRO PER**

6
7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9

10
11 SUSAN SCHOFIELD, an
12 individual,

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17 Defendants.
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Case No: 2:22-cv-04332-JGB (AS)

EXHIBIT C

Re: Plaintiff's Motion to Reconsider

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20 **EXHIBIT C**
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11/7/22, 9:39 PM

Gmail - Your Case



Susan Cabana <susandcabana@gmail.com>

Your Case

Farhan Ali <alif@ladlinc.org>

Thu, Dec 9, 2021 at 7:39 PM

To: Susan Cabana <susandcabana@gmail.com>

Ms. Schofield:

Good evening.

So, as I'm sure you're well aware, I was not your attorney at that time for the initial detention hearing for which you are citing CRC 5.674. I was also not your hearing at the .26 hearing. I cannot speculate as to what your attorney at the time may or may not have been thinking. I do not want to speculate as to what your attorney's analysis was RE the evidence that you state was available at the time because as of today, speculation is not a fruitful use of both our time. I will emphasize to you again that the time to appeal what happened at the time of the detention hearing and the subsequent

From: CACD Civil Intake <no-reply@cacd.uscourts.gov>
Sent: Tuesday, November 8, 2022 4:54 PM
To: ASChambers
Subject: Filing information (EDSS) - Case #: 2:22-cv-04332-JGB (AS)
Attachments: Memorandum of Points and Authorities in Support of Motion to Reconsider and Objection.pdf; Exhibit A.pdf; (PROPOSED) ORDER.pdf; Notice of Errata.pdf; Exhibit B.pdf; Plaintiff's Objection.pdf; Notice of Motion to Reconsider.pdf; Declaration.pdf; Exhibit C.pdf

Name: Susan Schofield

Tracking Number: EDS-221107-000-5865

Date of Submission: 11/7/2022 9:49:20 PM

Uploaded files:

- Memorandum of Points and Authorities in Support of Motion to Reconsider and Objection.pdf
- Exhibit A.pdf
- (PROPOSED) ORDER.pdf
- Notice of Errata.pdf
- Exhibit B.pdf
- Plaintiff's Objection.pdf
- Notice of Motion to Reconsider.pdf
- Declaration.pdf
- Exhibit C.pdf